AMENDMENT & RESPONSE UNDER 37 C.F.R. § 1.116 - EXPEDITED PROCEDURE   Page 3
Serial Number: 09/031,326   Dkt: 303.376US1
Filing Date: February 26, 1998
Title: PARAMETER POPULATION OF CELLS OF A HIERARCHICAL SEMICONDUCTOR STRUCTURE VIA FILE RELATION

updating a set of parameters of a programmable design cell by relating corresponding local variables of a local file corresponding to the programmable design cell to corresponding global geometric variables of the global file.

REMARKS

Applicant has carefully reviewed and considered the Office Action mailed on February 26, 2002, and the references cited therewith.

Claims 1, 9, 15 and 22 are amended, no claims are canceled or are added; as a result, claims 1-25 remain pending in this application.

Information Disclosure Statement

Applicant respectfully requests that a copy of the 1449 Form, listing all references that were submitted with the Information Disclosure Statement filed on January 9, 2001, marked as being considered and initialed by the Examiner, be returned with the next official communication.

§102 Rejection of the Claims

Claims 1-25 were rejected under 35 USC § 102(b) as being anticipated by Robinson et al. (U.S. Patent No. 5,524,244).

The Robinson et al patent relates to a system for dividing a processing task into tasks for a programmable real-time signal processor (SPROC) and tasks for a decision making microprocessor. The system is described as being programmed in a manner requiring entry of nothing more than a block diagram of a user's design. The patent discusses a SPROC cells Function Library that "contains over fifty predefined functions which can be used through the graphical interface of the SPROClab development system" (col 36, lines 43 - 45). While the Robinson et al patent may show that the SPROC cells are "design cells" useful for putting multiple instances of themselves in a circuit design with certain variations based on file association, it does not show how the programmable "design cells" themselves may be created from abstract geometric shapes - i.e. the "geometric variables relating to a physical layout" called

for in amended claim 1 and discussed in Applicant's patent specification. The amendments to claim 1 serve to highlight the differences between the Applicant's claimed invention and the cited Robinson patent. Amended claim 1 recites, *inter alia*, " a plurality of programmable design cells" having "a set of parameters created by relating the corresponding local variables within a local file to appropriate global geometric variables values from the global file". Claim 1 also requires that the global geometric variables are "relating to a physical layout of element blocks of the hierarchical semiconductor structure". In the context of the claimed invention, the claim speaks of how the programmable "design cells" are created from the geometric shapes.

In contrast, the cited Robinson et al patent describes a system where a SPROC cells Function Library already exists and already contains <u>signal flow parameters</u> of blocks in a signal flow system (col 34, lines 21-27). Robinson does not use "global geometric variables" which "relate to a physical layout of element blocks of the semiconductor structure". Thus the cited Robinson et al patent does not teach each element of claim 1 because it does not show the "local files," or "programmable design cells," in the same arrangement calkled for in claim 1.

As to amended claim 9, there is no showing in the cited Robinson et al patent of "a computer program stored thereon to update a set of geometric parameters of a design cell by relating local geometric variables of a local file for the design cell to a global file of global geometric variables relating to layout of element blocks of a hierarchical structure' as required in amended claim 2. The cited Robinson et al patent does not update a set of parameters by relating local parameters to a global file of global geometric variables."

As to amended claim 15, there is no showing in Robinson of "a computer program" to "automatically update"a set of parameters" for programmable design cells which reads from a "global file of global geometric values" for the "global geometric variables to which the local variables of the local file correspond." The cited Robinson et al patent has no such computer program and does not contemplate programmable design cells functioning as amended claim 15 requires.

In the method of ameded claim 22, the operation of "updating a set of parameters of a programmable design cell by relating corresponding local variables of a local file corresponding to the programmable design cell to corresponding global geometric variables of the global file" is

not disclosed or suggested in the cited Robinson et al patent.

Claims 2-8, 10-14, 16-21 and 23-25 depend, directly or indirectly, on ameded claims 1, 9, 15 and 22, respectively, and are patentable over the cited Robinson patent for the reasons argued above, as well as for incluision of the additional elements in the claims. Since the independent claim is patentable over the cited Robinson patent, all claims depending from them are also patentable.

Reconsideration and allowance of claims 1-25 is respectfully requested in view of the amendments to the independent claims and the explanations set forth above.

CONCLUSION

Applicant respectfully submits that the claims are in condition for allowance and notification to that effect is earnestly requested. The Examiner is invited to telephone Applicant's attorney at (612) 373-6970 to facilitate prosecution of this application.

If necessary, please charge any additional fees or credit overpayment to Deposit Account No. 19-0743.

Respectfully submitted,

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